

FILED MAY 15 CV 03979

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

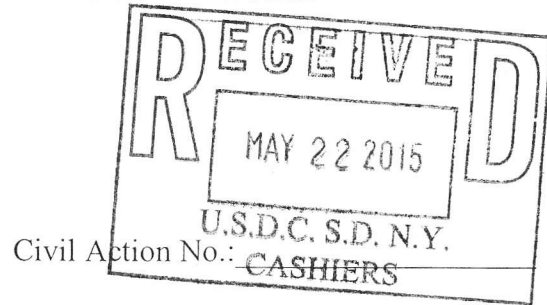
KONINKLIJKE PHILIPS N.V.,

Plaintiff,

v.

IGUZZINI LIGHTING USA, LTD.,  
IGUZZINI LIGHTING NORTH AMERICA,  
INC., and  
IGUZZINI ILLUMINAZIONE S.P.A.,

Defendants.



**COMPLAINT**  
JURY TRIAL DEMANDED

Plaintiff Koninklijke Philips N.V. ("Philips") brings this complaint for patent infringement against Defendants iGuzzini Lighting USA, Ltd., iGuzzini Lighting North America, Inc., and iGuzzini Illuminazione S.p.A. (collectively, "iGuzzini").

**NATURE OF THE ACTION**

1. This is an action for patent infringement under 35 U.S.C. § 271, et seq., by Philips against iGuzzini for infringement of United States Patent Nos. 6,094,014 ("the '014 patent"), 6,250,774 ("the '774 patent"), 6,577,512 ("the '512 patent"), 6,586,890 (the '890 patent), and 7,802,902 ("the '902 patent") (collectively, the "patents-in-suit").

**THE PARTIES**

2. Plaintiff Koninklijke Philips N.V., formerly known as Koninklijke Philips Electronics N.V., is a corporation organized and existing under the laws of the Netherlands, with a principal place of business at Breitner Center, Amstelplein 2, 1096 BC Amsterdam, The Netherlands.

3. Upon information and belief, Defendant iGuzzini Lighting USA, Ltd. is a corporation organized and existing under the laws of Delaware, with a principal place of business at 60 Madison Avenue, 2nd Floor, New York City, NY 10010.

4. Upon information and belief, Defendant iGuzzini Lighting North America, Inc. is a corporation organized and existing under the laws of Canada, with a principal place of business at 5455 Ave De Gaspe Suite 100, Montreal Quebec Canada, H2T-3B3.

5. Upon information and belief, Defendant iGuzzini Illuminazione S.p.A. is a corporation organized and existing under the laws of Italy, with a principal place of business at Via Mariano Guzzini 37 62019 Recanati (MC), Italy.

#### **JURISDICTION AND VENUE**

6. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338.

7. Upon information and belief, iGuzzini has made, used, provided, sold, offered to sell, imported, or distributed to others for such purposes, lighting products and systems employing light-emitting diodes (“LEDs”) for illumination (“LED Lighting Devices”) throughout the United States, including New York and this judicial district.

8. Upon information and belief, iGuzzini maintains or has maintained continuous and systematic contacts with New York and this judicial district and/or has committed tortious activity within the district.

9. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b), (c) and/or 1400(b), as inter alia iGuzzini is subject to personal jurisdiction in this district.

**FACTUAL BACKGROUND**

10. Upon information and belief, iGuzzini's LED Lighting Devices include, without limitation, products under the iGuzzini brand, including without limitation the Laser Blade, Primopiano-LED, Woody LED, and Palco LED lines. iGuzzini's LED Lighting Devices include interior and exterior lighting products including downlights, projector and track lights, pendant and modular system lights, wall mounted lights, ceiling lights, table lights, pole mounted lights, flood lights, in-ground lights, bollard lights, wall recessed lights, and graphic lighting products.

**COUNT I: PATENT INFRINGEMENT OF U.S. PATENT NO. 6,094,014**

11. Plaintiff incorporates by reference paragraphs 1-10 as if fully set forth herein.

12. On July 25, 2000, the U.S. Patent and Trademark Office ("Patent Office") duly and legally issued the '014 patent, entitled "Circuit Arrangement, and Signaling Light Provided with the Circuit Arrangement," to Marcel J. M. Bucks et al. Plaintiff is the assignee and owner of the '014 patent, a copy of which is attached hereto as Exhibit A.

13. Upon information and belief, iGuzzini is engaged in activities that infringe the '014 patent under 35. U.S.C. § 271 by making, using, offering to sell, selling and/or importing LED Lighting Devices, including without limitation its Woody LED products, in the United States.

14. Upon information and belief, iGuzzini is aware of the '014 patent and its infringement is deliberate, willful, and in reckless disregard of Plaintiff's patent rights.

15. Plaintiff has been and continues to be injured by the infringing activities of iGuzzini.

**COUNT II: PATENT INFRINGEMENT OF U.S. PATENT NO. 6,250,774**

16. Plaintiff incorporates by reference paragraphs 1-10 as if fully set forth herein.

17. On June 26, 2001, the Patent Office duly and legally issued the '774 patent, entitled "Luminaire," to Simon H. A. Begemann et al. Plaintiff is the assignee and owner of the '774 patent, a copy of which is attached hereto as Exhibit B.

18. Upon information and belief, iGuzzini is engaged in activities that infringe the '774 patent under 35. U.S.C. § 271 by making, using, offering to sell, selling and/or importing LED Lighting Devices, including without limitation its Laser Blade downlight, Primopiano-LED projector, and Woody LED products, in the United States.

19. Upon information and belief, iGuzzini is aware of the '774 patent and its infringement is deliberate, willful, and in reckless disregard of Plaintiff's patent rights.

20. Plaintiff has been and continues to be injured by the infringing activities of iGuzzini.

**COUNT III: PATENT INFRINGEMENT OF U.S. PATENT NO. 6,577,512**

21. Plaintiff incorporates by reference paragraphs 1-10 as if fully set forth herein.

22. On June 10, 2003, the Patent Office duly and legally issued the '512 patent, entitled "Power Supply for LEDs," to Ajay Tripathi et al. Plaintiff is the assignee and owner of the '512 patent, a copy of which is attached hereto as Exhibit C.

23. Upon information and belief, iGuzzini is engaged in activities that infringe the '512 patent under 35. U.S.C. § 271 by making, using, offering to sell, selling and/or importing LED Lighting Devices, including without limitation its Palco LED and Primopiano-LED projector products, in the United States.

24. Upon information and belief, iGuzzini is aware of the '512 patent and its infringement is deliberate, willful, and in reckless disregard of Plaintiff's patent rights.

25. Plaintiff has been and continues to be injured by the infringing activities of iGuzzini.



**COUNT IV: PATENT INFRINGEMENT OF U.S. PATENT NO. 6,586,890**

26. Plaintiff incorporates by reference paragraphs 1-10 as if fully set forth herein.
27. On July 1, 2003, the Patent Office duly and legally issued the '890 patent, entitled "LED Driver Circuit with PWM Output," to Young-Kee Min et al. Plaintiff is the assignee and owner of the '890 patent, a copy of which is attached hereto as Exhibit D.
28. Upon information and belief, iGuzzini is engaged in activities that infringe the '890 patent under 35. U.S.C. § 271 by making, using, offering to sell, selling and/or importing LED Lighting Devices, including without limitation its Palco LED and Primopiano-LED projector products, in the United States.
29. Plaintiff has been and continues to be injured by the infringing activities of iGuzzini.

**COUNT V: PATENT INFRINGEMENT OF U.S. PATENT NO. 7,802,902**

30. Plaintiff incorporates by reference paragraphs 1-10 as if fully set forth herein.
31. On September 28, 2010, the Patent Office duly and legally issued the '902 patent, entitled "LED Lighting Fixtures," to Timothy B. Mosset al. Plaintiff is the assignee and owner of the '902 patent, a copy of which is attached hereto as Exhibit E.
32. Upon information and belief, iGuzzini is engaged in activities that infringe the '902 patent under 35. U.S.C. § 271 by making, using, offering to sell, selling and/or importing LED Lighting Devices, including without limitation its Palco LED products, in the United States.
33. Plaintiff has been and continues to be injured by the infringing activities of iGuzzini.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests the following relief:

- (a) a declaration that iGuzzini infringes the patents-in-suit and a final judgment incorporating same;

(b) entry of preliminary and/or permanent equitable relief, including but not limited to a preliminary and/or permanent injunction that enjoins iGuzzini and any of its officers, agents, employees, assigns, representatives, privies, successors, and those acting in concert or participation with it from infringing and/or inducing infringement of the patents-in-suit;

(c) an award of damages sufficient to compensate Plaintiff for infringement of the patents-in-suit by iGuzzini, together with prejudgment and post-judgment interest;

(d) a declaration or order finding that iGuzzini's infringement is willful and an order trebling damages under 35 U.S.C. § 284;

(e) a judgment holding that this is an exceptional case under 35 U.S.C. § 285 and awarding Plaintiff its reasonable attorneys' fees, costs, and expenses; and

(f) such other relief deemed just and proper.

**JURY DEMAND**

Under Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby demands trial by jury of all issues so triable by a jury in this action.

Respectfully submitted,

Dated: May 22, 2015

By: Laura P. Masurovsky  
Laura P. Masurovsky (1924000)  
FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP  
901 New York Avenue, N.W.  
Washington, D.C. 20001-4413  
Tel: (202) 408-4000  
Fax: (202) 408-4400  
E-Mail: laura.masurovsky@finnegan.com

Attorney for Plaintiff  
KONINKLIJKE PHILIPS N.V.